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October 8, 2020

VIA ECF

Honorable Zahid N. Quraishi, U.S.M.J.
United States District Court
District of New Jersey
402 East State Street
Trenton, NJ 08608

Re: *AC Holdco, Inc., et al. v. Beable Education, Inc., et al.*
Civil Action No. 3:20-cv-09211-MAS-ZNQ

Dear Judge Quraishi:

Our firm, together with Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul Weiss”), represent Plaintiffs, AC Holdco, Inc. and Achieve3000, Inc. (collectively, “Plaintiffs”), in the above-captioned action. In accordance with your Honor’s individual practices and L. Civ. R. 101.1(c), we make this application for the admission *pro hac vice* of Nicholas Groombridge, J. Steven Baughman and Megan Raymond of Paul Weiss.

I have enclosed the Certifications of Mr. Groombridge, Mr. Baughman and Ms. Raymond, which certify their bar admission status and good standing, as well as my own Certification as local counsel, which certifies compliance with L. Civ. R. 101.1(c). Also enclosed is a proposed Order.

We respectfully request that the Court admit Mr. Groombridge, Mr. Baughman and Ms. Raymond *pro hac vice* as counsel for Plaintiffs. Counsel for Defendants consents to this request. If the enclosed application and Order meet with your Honor’s approval, we respectfully request that you enter the Order and file it with the Clerk.

Thank you for your consideration of this application.

Respectfully yours,

/s/ Kevin H. Marino

Kevin H. Marino

Enclosures

cc: All counsel of record